

UNITED STATES DISTRICT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

LAUREN CUNNINGHAM

CIVIL ACTION NO. 18-CV-00558-UDJ-CBW

VERSUS

UNASSIGNED DISTRICT JUDGE

ZEUS CAFE, INC., ZEUS  
MEDITERRANEAN, LLC, ZEUS, UL,  
LLC, ZEUS CAFE NEW ORLEANS, LLC  
BALBEISI FOOD SERVICES, LLC,  
BALBEISI RESTAURANT GROUP, INC.,  
NIDAL BALBEISI and AMJAD AL-BAQAIN

MAGISTRATE JUDGE WHITEHURST

*Electronically Filed*

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**STATEMENT OF UNCONTESTED FACTS**

Pursuant to the local rule 56.1 for the United States District Court for the Western District of Louisiana, Defendant submits the following material facts to which it contends there are no genuine issues as to material fact:

1. Plaintiff sued Al-Baqain individually.
2. Defendant, Al-Baqain, was not Plaintiff's employer.
3. Plaintiff claims she was constructively discharged on October 11, 2016.
4. Plaintiff does not allege any improper conduct occurred after October 11, 2016.
5. Plaintiff's Complaint was filed on April 23, 2016.

Respectfully submitted,

**SCOFIELD & RIVERA, L.L.C**

BY: *s/Bryan D. Scofield*

**BRYAN D. SCOFIELD - #19147**

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**ATTORNEYS FOR Amjad Al-Baqain**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the above and foregoing has this date been filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all attorneys of record by operation of the court's electronic filing system.

Lafayette, Louisiana, this 10th day of August, 2018.

*s/Bryan D. Scofield*

**BRYAN D. SCOFIELD - #19147**